

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REFERENCE

17

DATE: SEPTEMBER 9, 1982

SITE NAME TRIEM STEEL

SUBJECT: Inspection of Triem Steel and Processing Inspection, Chicago Heights,
Illinois ILD020958298

SITE ID ILD001744572

RECEIVED

US EPA RECORDS CENTER REGION 5

FROM: Gale Hruska

SEP 13 1982

TO: Part A File

ILL. E.P.A. - D.I.P.C.
STATE OF ILLINOIS

449971

Participants: G. Hruska (USEPA), Bonnie Eleder (IEPA), George
Ranney (engineer for Triem Steel), John Fredrickson (Triem Steel)

Background: In 1981 an ISS inspection was made at the facility and a compliance order was issued. On June 17, 1981 the order was withdrawn, USEPA having determined that the Triem facility met the definition of a "Totally enclosed Treatment facility". The facility also requested to withdraw its permit (according to a memo in the file).

I was given the assignment to determine if we should send out an interim status acknowledgement letter. During the review of the part A permit application and the compliance action files it came to my attention that the facility included an evaporation pond and a settling pond which might be considered as a surface impoundment. After contacting IEPA it was agreed that an inspection was warranted.

Results of inspection

On September 8, 1982, an inspection of the settling and evaporation ponds was made. The following description is a result of the visual inspection and our meeting:

The facility generates spent pickle liquor (K062). It is neutralized in a closed system which apparently meets the definition of a totally enclosed treatment facility. The effluent from this treatment goes to a settling pond, where oil is skimmed from the pond and sent for disposal. Excess water is allowed to trickle into an evaporation pond, while any sludge is allowed to accumulate in the settling pond. This system has been in use for about 1 3/4 years.

The settling pond was full of liquid while the evaporation pond was virtually empty. There was only a thin, scattered

layer of sediment in the evaporation pond. Our conversation with Mr. Hanney and Mr. Fredrickson

further informed us that neither of the units have ever been emptied of sludge, however they expect to take the sludge out of the settling pond this fall. The sludge has not been analyzed to date.

Bonnie Elender told the Triem representatives that IEPA would consider the matter and get back to them.

Analysis

The effluent going into the ponds is a solid waste generated from the treatment of a hazardous waste and is therefore a hazardous waste and is regulated (§261.3). The question to be answered is: Is the double pond system an uncovered tank or is it a surface impoundment? After reading the preamble to the Part 264 regulations dealing with tanks and surface impoundments (FR 45,98, May 19, 1980 pp. 35200 - 35204), and after speaking with Bob Stone, it appears that the ponds meet the definition of a tank. (They are constructed of non-earthen materials, i.e. concrete; they appear to provide structural support as opposed to being used as a liner; and they appear to continuously connected, with no seams visible.)

Subsequent Actions

I spoke with Bonnie Elender of IEPA on 9/10/82. IEPA also feels that the ponds should be considered as a tank for regulatory purposes. Triem Steel is going to have the waste analyzed and submit the analysis to IEPA. IEPA will then proceed to take the necessary actions to bring the facility into compliance. IEPA will inform the facility that it needs to submit a revised Part A application to USEPA.

I recommend that USEPA not take any regulatory action against the facility until at least the revised Part A is submitted since USEPA erroneously advised the facility that they were non-regulated.

cc. Horst Wittenbrink

Bonnie Elender, IEPA

TRIEM STEEL SURFACE IMPOUNDMENT OR TANK

on

Note:
Entire site is unguarded.

CYCLONE FENCE
STORM WATER CATCH BASIN

EVAPORATION POND

SETTLING POND

TRICKLE FLOW PIPE

TRICKLE FLOW

INLET PIPE
TO FACILITY

100ft (est.)

FENCE

SOIL

SETTLING POND

TRICKLE FLOW PIPE

10ft (est.)

(VIRTUALLY EMPTY)

NOTE: The pipeline to the facility is underground. I was not sure if the outlet to the settling pond was above or below the liquid surface.

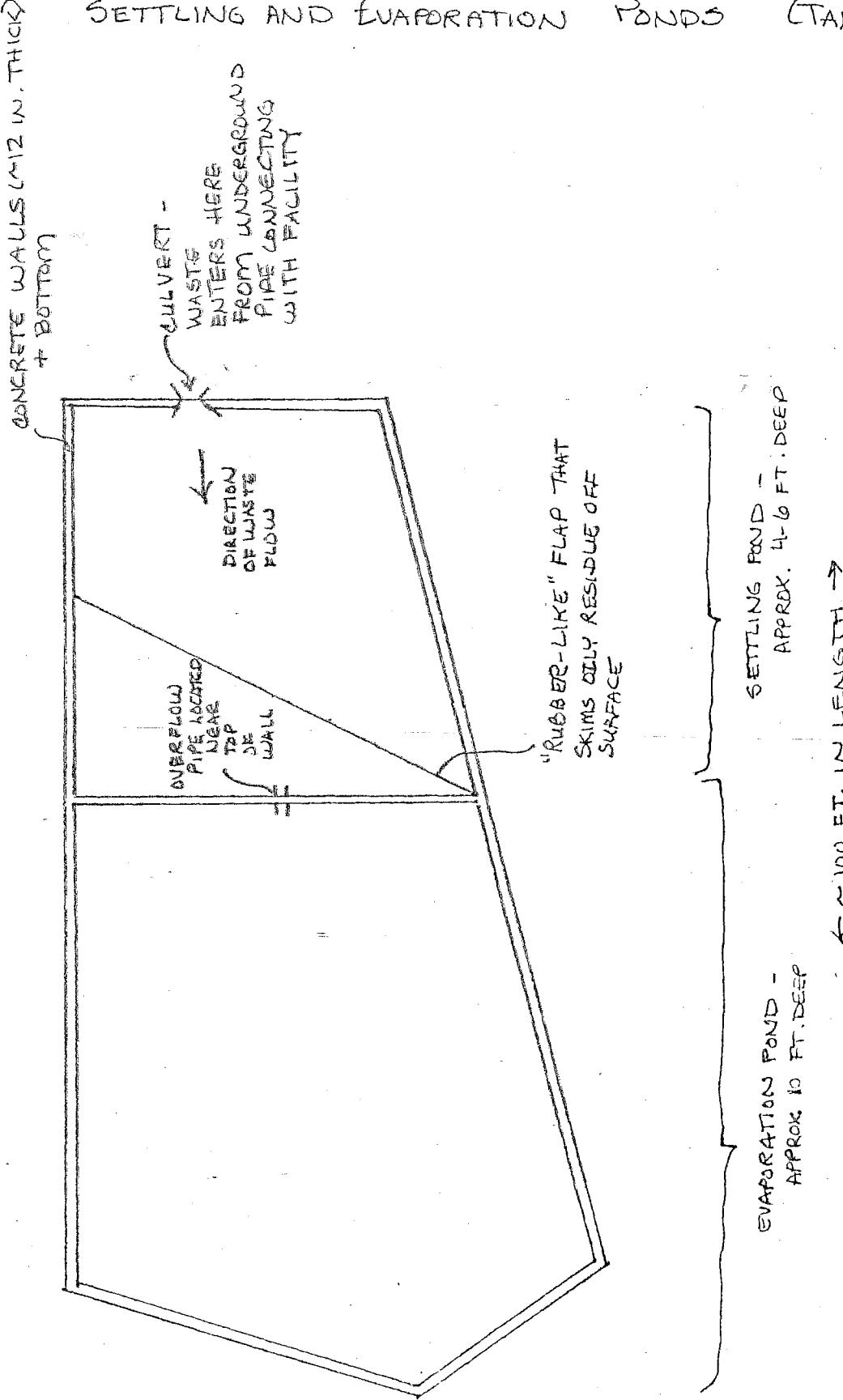
COOK COUNTY

03104509

CHICAGO HEIGHTS / TRIEM STEEL

9-8-82

SETTLING AND EVAPORATION PONDS (TANK)



NOTE: TANK IS UNCOVERED AND SITS IN A DEPRESSION, IS ENCLOSED BY A CYCLONE FENCE